

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO
BANKRUPTCY COURT

**INRE:
THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD OF
PUERTO RICO AS
REPRESENTATIVE OF THE
COMMONWEALTH OF PUERTO
RICO, ET ALs
DEBTORS**

**PROMESA TITLE III
NUM. 17BK3283-RTS**

MOTION INFORMING THE HONORABLE COURT

Comes now the movant party Hiram Pérez-Soto Pro Se and respectfully alleges and prays to the Honorable Bankruptcy Judge as follows:

1. Plaintiff filed a complaint in the District Court of Puerto Rico 3-19-CV-1266 against Judges of the Supreme Court, Intermediate Appellate Court and the Courts of First Instance of the Commonwealth of Puerto Rico against other government and former government officials and against private parties.

The claims contain in the complaint arose from the claims in a complaint filed in the Court of First Instance of Humacao HSCI2007-01040 of the Commonwealth of Puerto Rico. This last case was an inheritance case in which I was the plaintiff. After complying with the Case Management Procedure ordered by this Court an Order was made by this Honorable Court

copy is being attached with this motion. In the aforesaid Order it was ordered by the Honorable Judge in this case that the movant had the right to litigate the claims in the complaint against government and former government officials of the Commonwealth of Puerto Rico. But that any money judgment could not be executed against the Commonwealth of Puerto Rico. Furthermore any non-money judgment obtained by the movant against the Commonwealth of Puerto Rico that entails or causes more than de minimis cost to the Commonwealth of Puerto Rico cannot be executed in relation to those costs. If there is any disagreement between the movant party and the lawyers of the Commonwealth in relation to those costs that are more than de minimis the controversy will be submitted to this Court for final decision. In other words, non-money judgment in the nature of declaratory or injunctive relief will not be subject to the stay if they cost only de minimis cost to the Commonwealth. If the cost of those non-money judgments are more than de minimis then this cost cannot be executed. This Honorable Court will decide if there is disagreement about de minimis cost.

2. The movant party filed another complaint in the Federal Court 19-CV-1774 JAGG. That complaint arose from the same facts of the complaint filed in the Court of First Instance of Humacao HSCI2007-01040. The two complaints 19-CV-1774 and 19-CV-1266 arose from the same set of facts

contained in the claims of the complaint filed in the Court of First Instance of Humacao HSCI2007-01040. The Honorable Judge in the case 19-CV-1774 has agreed to consolidate both cases 19-CV-1266 and 19-CV-1774 subject to the approval of the Honorable Judge in the case 19-CV-1266. It is evident that the Order made by this Honorable Judge pertaining to the lifting of the stay in the case 19-CV-1266 is completely applicable to the case 19-CV-1774. We are attaching the complaint filed in the case 19-CV-1774, the motion asking for consolidation under Rule 42 of the Rules of Civil Procedures and the Order of the Honorable Judge in the case 19-CV-1774 accepting the aforesaid consolidation subject to the approval of the Judge in the case 19-CV-1266.

3. The reason I filed the complaint 19-CV-1774 was that Judges of the Intermediate Appeals Court in the cases KLAN2019-00305 and KLCE2019-00367 when I appealed the bias decisions made in February 2019 continued the practice of making bias decisions violating my constitutional rights of a fair and impartial forum. See Capperton v. ATMassey June 2009 US Supreme Court. Also the adversary lawyers continued in their collusion and conspiracy with the bias Judges making frivolous motions knowing the bias of the Judges. I also made pleadings in which I stated that the Judge heading the Judicial Administration had a conflict of interest in relation to the ethical

charge I filed against one of the Judges in the Court of First Instance of Humacao. Finally my pleadings were directed against a Judge of the Supreme Court that wasn't included in the prior complaint in which I was disbarred without due process of Law. There is no reason whatsoever for the prior Order of this Court made on August 22, 2019, as previously explained, applicable to the case 19-CV-1266 should not be made fully applicable to the case 19-CV-1774. Inasmuch as the two complaints arose from the same set of facts in the claims contained in the complaint filed in the Court of First Instance of Humacao HSCI2007-01040. We are sending this motion according to the Order pertaining to the Case Management and Administrative Procedure made by this Court and its being notified to the lawyers of the Oversight Board and the AAFAF.

WHEREFORE, it is respectfully requested to this Honorable Court that the Order made by this Court dated August 22, 2019 docket entry num. 7776 made applicable to the case 19-CV-1266 should be made fully applicable to the case 19-CV-1774.

I hereby certify that I sent copy of this motion the attorney of the Secretary of Justice of Puerto Rico Wandimar Burgos Vargas, email; wburgos@justicia.pr.gov. To Melissa Masscheder Torres, lawyer of the

Department of Justice of the Commonwealth of Puerto Rico, email; melissamasscheder@gmail.com. I also certify that under the eighth amendment noticed Case Management and Administrative Procedure; I notify Counsel of the Oversight Board Hermann Bauer hermann.bauer@oneillborges.com and Ubaldo M. Fernández Barrera ubaldo.fernandez@oneillborges.com; Counsel for AAFAF Diana M. Pérez dperez@omm.com, Luis C. Marini-Biaggi lmarini@mpmlawpr.com and Carolina Velaz-Rivero cvelaz@mpmlawpr.com; I also filed this motion with the Clerk of the Federal Court in order for them to notify the master list and the claims and noticing agents, see Section E of the Case Management Proceedings.

In San Juan, Puerto Rico, September 18, 2019



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